

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, *et al.*,

Plaintiffs,

v.

THE STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 5:21-cv-844 (XR)
(Consolidated Cases)

**CONSENT MOTION FOR ENTRY OF STIPULATED
CONFIDENTIALITY AND PROTECTIVE ORDER**

The United States hereby moves for entry of a Stipulated Confidentiality and Protective Order, attached hereto as Exhibit 1, pursuant to Federal Rule of Civil Procedure 26(c) and Local Rule CV-26. The parties to the above-captioned consolidated litigation have met and conferred and anticipate production of confidential, sensitive, or private documents or information in the course of this action. Good cause exists to enter the Proposed Order, in order to expedite discovery, protect confidential information, enable the parties to prepare for dispositive motions and trial, and address the handling of confidential material during and after the conclusion of this litigation. All parties to the consolidated litigation consent to entry of the proposed order. The United States therefore respectfully requests entry of the Proposed Stipulated Confidentiality and Protective Order.

DATE: February 4, 2022

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Principal Deputy Assistant Attorney General
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/s/ Daniel J. Freeman

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CERTIFICATE OF SERVICE

I hereby certify that on February 4, 2022, I served a true and correct copy of the foregoing via electronic mail on all counsel of record:

/s/ Daniel J. Freeman _____

Daniel J. Freeman

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